

# WORKING DRAFT FOR DISCUSSION

March 15, 2006

## Caucus Positions on Uses of D/Q

Caucus	Position at 3 <sup>rd</sup> Meeting
Industry	<p><b>Permit limit</b> – If WQBEL is greater than LQ, then WQBEL. Otherwise, LQ.</p> <p><b>Compliance/enforcement limit</b> – LQ</p> <p><b>Reporting limit</b> -- All data above LQ should be reported without qualifiers. Below LQ, report at LQ; flags are often lost.</p>
States	<p><b>Permit limit</b> – WQBEL</p> <p><b>Compliance/enforcement limit</b></p> <ul style="list-style-type: none"> <li>■ If WQBEL is less than ½ of LC, limit should be LC</li> <li>■ If WQBEL is greater and ½ LC but less than LC, the limit should be LQ.</li> <li>■ If WQBEL is greater than LQ, then limit should be WQBEL</li> </ul> <p><b>Reporting limit</b> – LC and LQ should be reported with flags and qualifications for numbers between LC and LQ. If value is non-detect or zero, report non-detect. For uploading data into databases, a non-detect should be considered zero.</p>
Environmentalists	<p><b>Permit limit</b> – WQBEL</p> <p><b>Compliance/enforcement limit</b> – WQBEL but there are ways to address a situation where WQBEL is below the LQ or LC (for ex, increase sampling frequency)</p> <p><b>Reporting limit</b> – When WQBEL is greater than LQ, the value should be reported. When WQBEL is less than LQ, then zero should be reported.</p>
Utilities	<p><b>Permit limit</b> – calculated permit limit (assume this means WQBEL)</p> <p><b>Compliance/enforcement limit</b> – LQ</p> <p><b>Reporting limit</b> – regulatory reporting – If value is above LQ, then the value should be reported. If value is below LQ, then “less than MQO” should be reported.</p>
Laboratories	<p><b>Permit limit</b> – recuse</p> <p><b>Compliance/enforcement limit</b> – recuse</p> <p><b>Reporting limit</b> – If value is less than LQ, report “less than LQ.” If value is less than LC, report “less than LC.” Opposed to reporting zero.</p>
EPA	<p><b>Permit limit</b> – WQBEL</p> <p><b>Compliance/enforcement limit</b> – LQ</p> <p><b>Reporting limit</b> – Use 0 if value is between 0 and LC in calculations. Use “less than LC” in reporting. For values between LC and LQ, report value with flag or qualifier. For values greater than LQ, use value.</p>